

**IN THE COURT OF CRIMINAL APPEALS  
 FOR THE STATE OF TEXAS**

JUAN CARLOS FLORES,  
 Appellant

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FILED  
 COURT OF CRIMINAL APPEALS  
 1/17/2020  
 DEANA WILLIAMSON, CLERK

vs.

PD NO. \_\_\_\_\_

THE STATE OF TEXAS,  
 Appellee

**MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR  
 DISCRETIONARY REVIEW**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW JUAN CARLOS FLORES, Appellant, by and through counsel on appeal, Jeromie Oney, and files this motion for an extension of 30 days in which to prepare and file Appellant's Petition for Discretionary Review. In support of this motion the Appellant would show the following:

1. This cause is styled *Juan Carlos Flores v. State of Texas* and is numbered 069074 in the trial court and No. 05-19-00034-CR in the Court of Appeals – 5<sup>th</sup> District of Texas.
2. The Appellant's Petition for Discretionary Review in this cause is due to be filed in the Court of Criminal Appeals Appeals on or before January 18, 2020.
3. This is the Appellant's first request for an extension of time to file the Petition for Discretionary Review.
4. The Appellant hereby requests an extension of thirty (30) days, until February 17, 2020, to file the Petition for Discretionary Review as Attorney for

appellant has not had sufficient time to prepare Appellant's Petition for Discretionary Review on or before January 18, 2020.

5. Undersigned counsel has not had sufficient time to review the record and prepare Appellant's Petition for Discretionary Review due to an extensive criminal practice that requires personal appearances in several courts in several counties.
6. This motion is not filed for purposes of delay, but so that there will be sufficient time to effectively prepare Appellant's Petition for Discretionary Review.

WHEREFORE, PREMISES CONSIDERED, the undersigned counsel respectfully prays that this Honorable Court extend the time for filing Appellant's Petition for Discretionary Review in this cause until February 17, 2020.

Respectfully submitted,  
Switzer | Oney Attorneys at Law, PLLC

/s/ Jeromie Oney  
Jeromie Oney  
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State Bar No. 24042248

ATTORNEY FOR APPELLANT

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Motion for Extension of Time to File Appellant's Petition for Discretionary Review was served on the Grayson County District Attorney's Office via electronic mail on the 17<sup>th</sup> day of January 2020.

/s/ Jeromie Oney  
Jeromie Oney